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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ANGEL ANTHONY ESPARZA, AND  
ALEXIS RODRIGUEZ,  
Defendants.

CASE NO. 2:23-CR-00271-DC

STIPULATION REGARDING EXTENSION OF  
TIME TO FILE RESPONSE TO MOTION TO  
DISMISS AND ~~PROPOSED~~ ORDER

**STIPULATION**

1. On October 4, 2025, defendant ALEXIS RODRIGUEZ, through counsel, filed a motion to dismiss the indictment. *See* Doc. No. 95. On October 5, 2025, defendant ANGEL ANTHONY ESPARZA, through counsel, joined the motion to dismiss. *See* Doc. No. 95. On October 9, 2025, the Court scheduled a hearing for November 14, 2025 on the motion to dismiss.

2. The government did not receive email notification—as it usually does—through the Court’s ECF notification system of either document numbers 95 or 96. Consequently, the government learned of the filing through an October 6, 2025 email communication from the Courtroom Deputy concerning scheduling a hearing on the motion. Undersigned counsel for the government intends to contact the clerk of court concerning the email notification issues.

3. Moreover, the motion to dismiss raises novel theories which the government is requesting additional time to research and draft a response. Consequently, the parties agree that an extension of

time for the government to file a response is appropriate.

4. The parties agree and stipulate, that good cause exist to extend the time in which a government response to the motion to dismiss is filed. Therefore, the parties request that the Court order that the government's response to the motion to dismiss be filed on or before October 17, 2025.

IT IS SO STIPULATED.

Dated: October 10, 2025

ERIC GRANT  
United States Attorney

/s/ ROBERT C. ABENDROTH  
ROBERT C. ABENDROTH  
Assistant United States Attorney

Dated: October 10, 2025

By: /s/ Christopher Richard Cosca  
CHRISTOPHER RICHARD COSCA  
Counsel for Angel Anthony Esparza

Dated: October 10, 2025

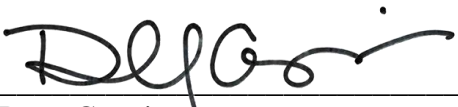
By: /s/ Dina Lee Santos  
DINA LEE SANTOS  
Counsel for Alexis Rodriguez

**ORDER**

The court, having received, read and considered the parties' stipulation filed on October 14, 2025, and good cause appearing therefrom, APPROVES the parties' stipulation. Accordingly, the deadline for the Government to file a response to the pending Motion to Dismiss and joinders in that Motion is EXTENDED to October 17, 2025.

IT IS SO ORDERED.

Dated: October 14, 2025

  
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Dena Coggins  
United States District Judge